IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

JAMILA DAVIS
a/k/a JAMILA BAKER

Petitioner,

vs. Docket No.: 2:05-CR-0482-JLL-01

10-4964(JLL)

UNITED STATES OF AMERICA,

Respondent.

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MOTION FOR LEAVE TO FILE MEMORANDUM OF LAW IN EXCESS OF 40 PAGES AS MANDATED PER LOCAL CIV. RULE 7.2(b)

COMES NOW, Petitioner, Jamila Davis requesting approval from this Honorable Court to file a memorandum of law in excess of 30 pages as mandated by Civ. Rule 7.2(b) In support of this request, Petitioner provides as follows:

1. Petitioner has filed a motion pursuant to Title 28 U.S.C. § 2255 requesting this Court vacate her sentence and conviction on the premises that the same was obtained in violation of his Sixth Amendment right to effective assistance of counsel.

2. The issues raised in the § 2255 memorandum of law are rather complex in nature as they address various Sixth Amendment violations during the pre-trial, trial, sentencing an appellate stage of the proceedings. The arguments address numerous aspects of trial counsel's ineffectiveness.

3. Petitioner presents that the additional pages presented in the Title 28 U.S.C. § 2255 memorandum of law is required to properly present and address the issues of ineffective assistance of counsel during these stages.

4. The documentation also includes exhibits that support the petition and allegations contained therein.

5. This request is not being made to frustrate these proceedings nor will the Government be prejudiced by this request.

6. Petitioner has not been able to confer with the Government due to her incarceration.

WHEREFORE, Petitioner Jamila Davis respectfully prays this Honorable Court GRANT this motion and allows the filing of his expanded memorandum of law.

Done this 21, day of September 2010

I hereby do certify that pursuant to Penalty of Perjury Title 28 U.S.C. § 1746 that on this 21 day of September 2010 I signed and mailed this document via the Federal Bureau of Prisons' Legal Mail System.

Jamila Davis
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